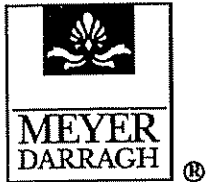


EXHIBIT A



MEYER ♦ DARRAGH
BUCKLER BEBENEK & ECK, P.L.L.C.

Attorneys-at-Law

U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219
Phone: (412) 261-6600 ♦ Fax: (412) 471-2754

www.mdbbe.com

PAUL R. ROBINSON
ATTORNEY-AT-LAW

DIRECT DIAL: (412) 553-7146
E-MAIL: probinson@mdbbe.com

February 21, 2006

Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
2815 Wilmington Road
New Castle, PA 16105

Re. Tina Lindquist v. Heim, L.P.
Case No: 04-249E
D/A: 9/25/02
Our File: ALFA-107530

Dear Mr. Hartman:

I am in receipt of plaintiff's expert report and curriculum vitae of Ralph Lipsey Barnett and am requesting the following information related to this report:

1. video tape of the human factors investigation of accidental foot switch activation noted under roman numeral 6 (page 7) of the report;
2. listing of the five (5) males and five (5) females names and addresses who took part in this investigation;
3. a complete copy of both Ralph Lipsey Barnett and Matthew J. Ulmenstine's files.

Additionally, although you have provided a curriculum vitae for Ralph Barnett, you have not provided a rate schedule or a listing of cases in which Mr. Barnett has testified as required by the Federal Rules of Civil Procedure. Please provide this information upon your receipt of this letter.

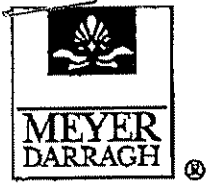
Thank you.

Very truly yours,

PAUL R. ROBINSON

PRR/hmt

EXHIBIT B



MEYER ♦ DARRAGH
BUCKLER BEBENEK & ECK, P.L.L.C.

Attorneys-at-Law

U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219
Phone: (412) 261-6600 ♦ Fax: (412) 471-2754

www.mdbbe.com

MATTHEW C. ASHBY
PARALEGAL

DIRECT DIAL: (412) 553-7048
E-MAIL: mashbv@mdbbe.com

February 24, 2006

VIA FACSIMILE (724) 652-8380
Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
2815 Wilmington Road
New Castle, PA 16105

Re: Tina Lindquist v. Heim, L.P.
Case No: 04-249E
D/A: 9/25/02
Our File: ALFA-107530

Dear Mr. Hartman:

Please allow this correspondence to serve as a request for dates of availability of Ralph L. Barnett for a discovery deposition in the above-captioned matter to take place in our offices. Attorney Paul Robinson of our office is available on the following dates:

March 16, 17, 20, 23, 24, 2006

Please contact our office at your earliest convenience to advise dates on which you and Mr. Barnett are available.

We look forward to hearing from you. Thank you.

Very truly yours,

MATTHEW C. ASHBY
Paralegal to PAUL R. ROBINSON, ESQUIRE

MCA/hmt

EXHIBIT C



Dallas W. Hartman P.C.

ATTORNEYS AT LAW

2815 Wilmington Road
New Castle, Pennsylvania 16105

724-652-4081 • 800-777-4081
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Dallas W. Hartman
Esquire**

Raymond J. Conlon
Esquire*

Thomas W. Minett
Esquire***

Jean S. Wright
Esquire*

Wayne P. Reid
Esquire**

Jeffrey S. Tarker
Esquire*

Richard J. Bosco
Esquire*

Ann Fosnaught
Esquire*

* Licensed in PA
** Licensed in OH and PA
*** of Counsel

March 7, 2006

VIA FACSIMILE AND REGULAR MAIL
412-471-2754

Paul R. Robinson, Esquire
MEYER, DARRAGH, BUCKLER, BEBENEK & ECK
U.S. Steel Tower, Suite 4850
600 Grant Street
Pittsburgh, PA 15219

RE: TINA LINDQUIST V. HEIM, L.P.
No. 12799 of 2004

Dear Paul:

I am writing this letter to follow up your recent correspondences. As we discussed at the Chicago airport after the most recent deposition of your corporate designee, I am willing to make my expert available for a deposition upon you providing me a date your expert will be available as well as copies of your expert(s) reports.

Further, I am in the process of having the video tape copied relating to the human factor tests. I will provide that upon my receipt of the same along with the names and addresses of the individuals who took part in that investigation.

I have enclosed a copy of Professor Barnett's listing of deposition/trials that he has testified at. I have also enclosed a copy of his fee schedule pursuant to your request.

Pennsylvania

Sharon/Hermitage
724-346-0616

Erie
814-461-8844

Butler
724-283-6662

Greenville
724-588-7277

Cranberry
724-742-0070

Mercer/Grove City
724-458-1558

Ellwood City
724-758-2510

Beaver Falls
724-846-8088

Ohio

Youngstown
330-757-7707

Warren
330-392-6669

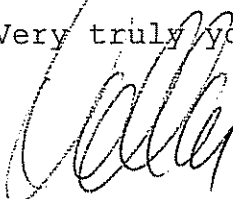
Salem
330-332-8822

Lisbon
330-424-1727

PAGE 2
MARCH 7, 2006

As to turning over Ralph Barnett and Matthew Ulmenstine's files, I am not willing to do so. Please itemize exactly what you are looking for and I will make a determination at that time if you are entitled to receive it.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Dallas W. Hartman", written over the typed name.

Dallas W. Hartman

DWH/smc
Enclosures

PROFESSOR RALPH LIPSEY BARNETT
DEPOSITION/TRIALS
Feb 16, 2006

ACTIVITY DAT	CASE CAPTION*	ACTIVITY	POSITION
02/21/2002	McFarland v. Osborne	Deposition	D
02/22/2002	Jordan v. Central Mining	Deposition	D
03/20/2002	Portillo v. Valley Tool	Deposition	P
04/09/2002	Black v. National Machinery	Deposition	D
04/19/2002	Bruce v. General Truck	Deposition	P
04/22/2002	Corey v. Crestview	Deposition	P
04/30/2002	Hermann v. Catttron	Deposition	
05/10/2002	Gates v. Graycor	Deposition	P
05/13/2002	Hollis v. Waubonsee	Deposition	D
05/21/2002	Baker v. Speedway	Deposition	P
06/07/2002	Diehl v. Blaw-Knox	Deposition	D
06/11/2002	Washington v. Joslyn	Deposition	P
06/21/2002	Jordan v. Central Mine Equipment	Trial	D
06/25/2002	Gates v. Graycor	Deposition II	P
07/09/2002	Leonard v. Triodyne Inc.	Deposition	D
07/23/2002	Diehl v. Blaw-Knox	Trial	D
08/23/2002	Meyerin v. Landry	Deposition	P
08/29/2002	Harter v. Volusia County	Trial	D
09/09/2002	Hamilton v. New Brandford	Trial	P
09/11/2002	Washington v. Joslyn	Trial	P
09/12/2002	Hamilton v. New Brandford	Trial	P
09/25/2002	Venneberg v. Six Flags	Deposition	D
10/22/2002	Jore v. Kouvato	Deposition	D
10/28/2002	Kealaula v. Estes	Deposition	P
11/15/2002	Engler v. Jim Keith Tools	Deposition	P

PROFESSOR RALPH LIPSEY BARNETT
DEPOSITION/TRIALS
Feb 16, 2006

ACTIVITY DATE	CASE CAPTION*	ACTIVITY	POSITION
01/08/2003	England v. Georgia Pacific	Deposition	D
01/29/2003	Avdelas v. Werner Ladder	Deposition	P
02/07/2003	Waller v. Rockwell	Trial	D
02/17/2003	Anderson v. Raymond	Deposition	P
02/27/2003	Shisler v. Community Centers of Auburn	Deposition	P
03/13/2003	Monahan v. Midwest Power	Deposition	P
03/26/2003	Willis v. RAN Management	Deposition	P
04/01/2003	Olson v. Leonard Eisele	Deposition	D
04/10/2003	Bodoy v. Ford Motor	Deposition	P
04/15/2003	Jore v. Kouvato	Trial	D
05/16/2003	Bodoy v. Ford Motor	Deposition Part II	P
06/04/2003	Ford v. Mannesman	Deposition	D
06/18/2003	Jones v. Sico	Deposition Part II	D
	Jones v. Sico	Supplemental Deposition	D
06/26/2003	Vance v. APV	Deposition	P
07/01/2003	Jones v. Sico	Trial	D
07/03/2003	Klovski Consultation	Deposition	C
07/23/2003	Caseiro v. Sears	Deposition	P
07/31/2003	Mills v. Dillard's	Deposition	P
08/07/2003	De Paolantino v. TCM Manufacturing	Deposition	D
09/03/2003	Ready v. United/Goedetke	Deposition	D
09/04/2003	Shisler v. Community Centers of Auburn	Deposition II	P
09/15/2003	Benavides v. Cushman	Deposition	D
09/18/2003	Baughman v. American Augers	Deposition	D

PROFESSOR RALPH LIPSEY BARNETT
DEPOSITION/TRIALS
Feb 16, 2006

ACTIVITY DAT	CASE CAPTION*	ACTIVITY	POSITION
09/22/2003	Reinhardt v. Keeper Corporation	Trial	C
10/07/2003	Ready v. United Goedetke	Trial	D
10/10/2003	Boshier v. Davis Standard	Deposition	D
10/13/2003	Klever v. Gerry's Motor Clinic	Deposition	P
10/27/2003	Geigle v. Robinson Leasing	Deposition	P
10/31/2003	Wachholz v. Levelor	Deposition	D
11/13/2003	Benavides v. Cushman	Trial	D
11/24/2003	Riner v. Garcia Security	Deposition	P
12/03/2003	Benson v. Lafarge of Canada	Deposition	P
12/10/2003	Govindaraj v. Sweeney Oil	Deposition	D
12/17/2003	Wingard v. Rotor Coaters	Deposition	P
12/19/2003	Anderson v. Raymond	Deposition	P
01/15/2004	Hipp v. Hull	Deposition	D
01/27/2004	Shisler v. Community Centers of Auburn	Daubert Hearing	P
02/23/2004	Reen v. Mt. Vernon	Deposition	D
03/11/2004	Pardo v. Evenflo	Deposition	P
03/31/2004	Wooley v. Continental Eagle	Deposition	D
04/20/2004	Benavides v. Cushman	Trial Testimony	D
04/21/2004	Benavides v. Cushman Water Pic v. Unifin	Trial Testimony Deposition Part I	D P
04/22/2004	Water Pic v. Unifin	Deposition Part II	P
05/14/2004	Conopco v. APV	Deposition	P
05/19/2004	Heien v. Colson Caster Co.	Deposition	D
05/20/2004	Romero v. Ditch Witch	Deposition	P
06/02/2004	Heien v. Colson Caster	Deposition Part II	D

PROFESSOR RALPH LIPSEY BARNETT
DEPOSITION/TRIALS
Feb 16, 2006

ACTIVITY DATE	CASE CAPTION*	ACTIVITY	POSITION
06/18/2004	Nelson v. White Construction	Deposition	D
06/28/2004	May v. Ray's Plumbing	Deposition	P
08/20/2004	Whitt v. Erb Lumber	Deposition	P
09/10/2004	Dorazio v. US Air	Deposition	P
09/17/2004	Diehl v. Blaw Knox	Trial	D
09/29/2004	Wright v. Besser	Deposition	P
10/26/2004	Baity v. Alfa Laval	Deposition	P
11/18/2004	Wright v. Besser	Trial	P
11/30/2004	Waters v. Mechanical Sales Assoc.	Deposition	D
12/16/2004	Franzen v. Kusske	Deposition	P
12/20/2004	Penwitt v. Restad Builders	Deposition	P
01/13/2005	Cox v. Ziolkowski Construction	Deposition	D
03/23/2005	Wingard v. Rotor Coaters	Trial	P
04/15/2005	McIntyre v. Clark	Trial	P
	McIntyre v. Clark	Trial	P
05/10/2005	Griffith v. Toro	Mediation	P
06/15/2005	Wolf v. Bilco	Deposition	D
07/15/2005	Gomez v. D R Horton	Deposition	P
08/17/2005	Josinsky v. Mettler Toledo	Deposition	D
09/01/2005	Santiuste v. Ditch Witch	Deposition	P
11/18/2005	Dolan v. Walmart	Deposition	P

FEE SCHEDULE

Professional Fees for Engineering Services, including
Deposition, Trial Testimony, Field Inspections, Safety Research,
Reports,

Travel Time, and Cancellation Fees

Senior Engineer/Scientist	\$205/Hour
Project Engineer/Scientist	\$175/Hour
Staff Engineer/Scientist	\$145/Hour
Technician/Graphics	\$ 95/Hour
Ralph L. Barnett	\$275/Hour
Ralph L. Barnett (Patent Testimony)	\$500/Hour
Ralph L. Barnett Inspection Time Only	
(When Accompanied by Other Personnel)	\$175/Hour

All major work done in the areas of literature searches, model making, graphic work for trial, and large scale experimentation, will be billed on the basis of individual quotations.

Typical expense charges are as follows:

Mileage \$0.445 per mile

Videotaping \$50.00 minimum

Videotape duplication \$35.00 per tape

Photographic (Non-Rush):

\$ 3-1/2_ x 5_ (or 4_ x 6_) prints numbered and mounted including labor & materials for photographic log	\$1.50 each
\$ 3-1/2_ x 5_ (or 4_ x 6_) prints numbered only	\$1.25 each
\$ 3-1/2_ x 5_ (or 4_ x 6_) prints with no numbers	\$1.00 each
\$ 8_ x 10_ standard enlargements	\$8.00 each

Storage:

\$ No charge for first 90 days.

\$ Subsequent monthly storage fee dependent on size of item (e.g. \$150 per month for automobiles).

Past due storage fees will result in refusal to retrieve or release artifacts.

☐ To preserve the chain of custody, Triodyne witnesses all inspections, by any parties, of artifacts in our possession. Clients are billed at the hourly rate of the witness. Clients will receive an estimate of the witness fee before the inspection.

Invoices:

Issued monthly, based on fees and expenses.

EXHIBIT D



Dallas W. Hartman P.C.

ATTORNEYS AT LAW

2815 Wilmington Road
New Castle, Pennsylvania 16105

724-652-4081 • 800-777-4081
FAX 724-652-8380

March 10, 2006

Dallas W. Hartman
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Esquire*

Thomas W. Minett
Esquire**

Jean S. Wright
Esquire*

Wayne P. Reid
Esquire**

Jeffrey S. Tarker
Esquire*

Richard J. Bosco
Esquire*

Ann Fosnaught
Esquire*

* Licensed in PA
** Licensed in OH and PA
o of Counsel

Paul R. Robinson, Esquire
MEYER, DARRAGH, BUCKLER, BEBENEK & ECK
U.S. Steel Tower, Suite 4850
600 Grant Street
Pittsburgh, PA 15219

RE: TINA LINDQUIST V. HEIM, L.P.
No. 12799 of 2004

Dear Paul:

Enclosed please find a copy of the video tape of the footswitch testing provided by Professor Barnett. Also, pursuant to your request, the following are the names of the individuals who took part in the testing:

Males: Peter Warner
Dror Kopernik
Bryan Lewis
Eduardo Torres
James Wingfield

Females: Vicki Lipinski
Chris Ann Smith
Rita Curtis
Marna Sanders
Sandy Moretti

Should you need additional information, please do not hesitate to contact me.

Very truly yours,


Dallas W. Hartman

DWH/smc
Enclosure

Pennsylvania

Sharon/Hermitage
724-346-0616

Erie
814-461-8844

Butler
724-283-6662

Greenville
724-588-7277

Cranberry
724-742-0070

Mercer/Grove City
724-458-1558

Ellwood City
724-758-2510

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Salem
330-332-8822

Lisbon
330-424-1727